



AIGLE

ETHICAL CODE AIGLE MACCHINE SRL

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1. INTRODUCTION

The Code of Ethics is the main tool for implementing ethics within the company, aimed at clarifying and defining the set of principles that its recipients are required to comply with in their mutual relations and in their relations with stakeholders who have mutual interests with the Company. The recipients are therefore required to respect the values and principles of the Code of Ethics and are required to protect and preserve, through their conduct, the reputation and image of Aigle Macchine srl as well as the integrity of its economic and human assets.

The values, rules of conduct and behaviour set out in this Code are binding on:

- the Company's Board of Directors and Board of Statutory Auditors;
- the Company's employees;
- those who, in any case, operate on behalf of and/or on the instructions of the Company (e.g., under contract, such as consultants, teachers, or under specific power of attorney, such as defence lawyers).

The Recipients of the Code are required to comply with the provisions contained therein and to adapt their conduct and actions to the principles expressed therein.

2. VALUES

This Code of Ethics identifies the fundamental principles that define the Company's ethical standards and establishes guidelines for conduct consistent with its mission.

In this regard, Aigle Macchine Srl recognises and embraces the values represented by this Code and identified below:

2.1 Fairness and value of the individual

The company protects and promotes the recognition and safeguarding of the dignity, freedom and equality of human beings, the protection of work and trade union freedoms, health and safety. It recognises the equal dignity of its male and female workers and is committed to fostering a working environment free from prejudice and discrimination.

2.2 Legality and

All activities carried out in the name and on behalf of the company are based on the principles of integrity and transparency and are conducted with loyalty, a sense of responsibility and in good faith.

The Company is committed to ensuring fairness, completeness, accuracy, uniformity and timeliness in the management and communication of company information, thus avoiding misleading behaviour from which undue advantage could be gained.

2.3 Ethics and transparency

The company is aware that where ethics and transparency do not exist, there is no possibility for the development of healthy economic activity and a free and informed civil society.

The company conducts its activities, both in its relations with customers and with stakeholders, in accordance with ethical and transparent behaviour based on integrity, fairness, loyalty, impartiality, independence and autonomy of judgement, clarity of the positions taken and the decision-making and implementation mechanisms adopted, and the absence of conflicts of interest.

2.4 Accountability

The company considers it essential, at all levels, to be accountable to all stakeholders for the decisions taken, the actions undertaken and the results achieved, and fulfils its obligations to prepare financial statements, the notes to the financial statements and communications to its stakeholders with scrupulousness and reliability.

3. THE COMPANY'S PRINCIPLES OF CONDUCT

Adherence to the above values and their integration into the work of all those subject to this Code give rise to a number of principles of conduct that Aigle Macchine srl applies in all its commercial relations and which it expects to be applied by those working in the name or on behalf of the company. These principles of conduct are:

3.1 Compliance with current legislation

In carrying out its activities, the company acts in compliance with current legislation (national and international), as well as with the Internal Regulations applied to employees, and requires the Recipients of this Code to comply with these requirements and to behave in a manner that does not compromise the moral and professional reliability of the company.

In particular, the Company and the Recipients, in carrying out their activities, act in full compliance with the national and international laws and regulations applicable to them, as well as the Internal Regulations applied to employees, including laws on taxation, social security, intellectual and industrial property protection and copyright, competition and antitrust regulations.

3.2 Conflicts of interest

The Recipients of this Code must ensure that all business decisions are taken in the interests of the company, in line with the principles of proper corporate and business management of the Company itself. They must therefore avoid all situations in which a conflict of interest may arise, understood as the existence of relationships with other Recipients and/or third parties which, due to their nature (family, personal, financial, etc.), may affect the duties and activities performed, interfering with or invalidating the ability to make decisions in an impartial and objective manner.

Any situations of conflict, even if only potential, must be promptly and fully disclosed to the Company, and the person in conflict must refrain from performing or participating in any acts that could harm the Company or compromise its reputation.

3.3 Confidentiality of information

The company guarantees the confidentiality of the information in its possession and refrains from seeking confidential data, except in cases of express and informed authorisation and compliance with applicable legal provisions.

It also undertakes to protect the data acquired, stored and processed in the course of its management activities, in full compliance with the provisions of the law on privacy.

Any investigation into the ideas, preferences, personal tastes and, in general, the private lives of employees and other collaborators of the Company is prohibited. The processing of personal data must in any case be preceded by the express consent of the data subject, given following specific information and in accordance with current legislation.

Furthermore, employees, consultants and other collaborators of the Company are required not to use information acquired in the performance of their duties for purposes not related to the strict exercise of those duties.

Communications with the outside world

In addition to the provisions on confidentiality, the communication and disclosure to external parties (including through the mass media) of news, information and data relating to the Company is based on respect for the right to information and is reserved exclusively for the company departments responsible for this task; under no circumstances is it permitted to disclose false or biased news or comments. All communication activities comply with the laws, rules and practices of professional conduct and are carried out with clarity, transparency, timeliness and accuracy.

3.4 Protection of industrial and intellectual property

The company acts in full compliance with the industrial and intellectual property rights legitimately held by third parties, as well as with the laws, regulations and conventions, including those at EU and/or international level, protecting such rights.

In particular, in the performance of their activities, the Recipients shall refrain from any conduct that may constitute infringement of industrial property rights or patents, designs or industrial models, whether national or foreign.

Furthermore, all Recipients shall refrain from using in any form, unlawfully and/or improperly, for their own benefit, that of the company or of third parties, intellectual property (or parts thereof) protected under copyright law and in particular under the Copyright Law (Law No. 633/1941).

3.5 Giving/accepting gifts or other benefits

No direct or indirect offer or granting of money, gifts or benefits of any kind to customers, suppliers, external consultants and their employees and collaborators is permitted for the purpose of influencing them in the performance of their duties and/or obtaining undue advantage, or which could even be interpreted as exceeding normal commercial or courtesy practices, or in any way aimed at obtaining favourable treatment in the conduct of any activity related to the Company, or which is intended to influence the beneficiary and induce them to behave in a manner contrary to their official duties, obligations of loyalty or in any way likely to distort competition (e.g. promises of economic advantages, favours, recommendations, promises of job offers, reward trips of a dubious nature).

In general, the company undertakes to condemn any conduct by the Recipients aimed at promising, offering, paying or accepting, directly or indirectly, money or other benefits for the purpose of obtaining or maintaining a business or securing an unfair advantage in relation to business activities.

Acts of commercial courtesy must be tracked and authorised by the Sales Department and are permitted provided that they are of modest value or in any case such as not to compromise the integrity or reputation of either party, or such as to be interpreted by an impartial observer as aimed at obtaining undue and/or improper advantages.

3.6 Administrative and accounting management

Accounting records must be kept accurately, completely and in a timely manner, in accordance with company accounting procedures, in order to provide a true and fair view of the financial position and results of operations.

The accounting system is based on generally accepted accounting principles and systematically records events arising from the Company's operations.

3.7 Diligence in the use of company resources

The Recipients of this document are required to operate with the diligence required and necessary to protect company resources, avoiding improper use that could cause damage or a reduction in efficiency for the Company, or in any case be contrary to the interests of the company.

The use of company resources is not permitted for personal use or interest of any kind. Any use of company resources that is in conflict with applicable laws is prohibited, even if such use could, in theory, result in an interest or advantage for the Company.

3.8 Protection of IT tools

The Recipients of this document must strictly comply with the Company's procedures and policies on IT security and must use company resources - such as personal computers, telephone equipment and other communication tools - in accordance with the aforementioned procedures and policies, avoiding any behaviour that could compromise the functionality and protection of the company's IT system.

It is not permitted in any way to alter the functioning of a company telematic or IT system or the data and information contained therein, or to interfere with programmes and archives, for any purpose whatsoever.

3.9 Environmental protection

Recipients are required to adopt behaviour aimed at protecting and preserving the environment around them.

The company is committed to identifying areas for improvement and reducing negative environmental impacts, also in compliance with the requirements of the Environmental Management System adopted in accordance with UNI EN ISO 14001.

4. COMPANY MANAGEMENT

The corporate bodies of the Company, aware of their responsibilities, are guided by the principles contained in this Code of Ethics and carry out their activities in accordance with the values of honesty, integrity in the pursuit of corporate objectives, loyalty, fairness, respect for people and rules, and mutual cooperation.

The commitment of the Directors and the Chairman is to conduct the company responsibly, in pursuit of value creation objectives.

Individuals are responsible for assessing situations of conflict of interest or incompatibility of functions, duties and positions both outside and within the company.

Members of the corporate bodies are required to:

- behaviour inspired by autonomy and independence, providing accurate information,
- behaviour inspired by integrity, loyalty and a sense of responsibility towards the company,
- assiduous and informed participation,
- awareness of their role,
- sharing of objectives and a critical spirit, in order to ensure a significant personal contribution.

Information received in the course of business is considered confidential and may not be used for any purpose other than the performance of the institutional functions for which each person is responsible. The commitments of loyalty and confidentiality undertaken by accepting the position are binding on the members of the Board of Directors, the Chief Executive Officer and the Chairman even after the termination of their relationship with the Company.

5. HUMAN RESOURCES

The Company attaches the utmost importance to those who work within the Company, contributing directly to its development, because it is through its human resources that the Company is able to provide, develop, improve and guarantee the optimal management of its services. It is also in the Company's interest to promote the professional development and growth of each resource's potential, also with a view to increasing the wealth of skills possessed by each employee or collaborator.

In particular, the Company:

- is committed to creating working conditions that protect the physical and mental integrity and health of workers and respect their moral character, avoiding discrimination, unlawful coercion and undue hardship;
- considers legislative compliance and continuous improvement to be fundamental ethical principles;
- is committed to adopting general principles of prevention in the implementation, modification and conduct of work activities;
- adopts criteria of merit, competence and, in any case, strictly professional criteria for any decision relating to the employment relationship with its employees and external collaborators; discriminatory practices in the selection, recruitment, training, management, development and remuneration of personnel, as well as any form of nepotism or favouritism, are expressly prohibited. All recruitment and promotion must be carried out in accordance with criteria of merit and competence;
- requires managers and all employees, each within their own area of responsibility, to adopt behaviour consistent with the principles set out above, which is conducive to their effective implementation.

Without prejudice to the provisions of law and contracts regarding the duties of workers, and in particular those relating to health and safety at work, employees are required to demonstrate professionalism, dedication, loyalty, a spirit of cooperation and mutual respect.

The dynamics that characterise the context in which the company operates require the adoption of transparent behaviour. The main factor for success is the professional and organisational contribution provided by each of the human resources involved.

Every employee or collaborator of the Company:

- conducts their work with professionalism, transparency, fairness and honesty, contributing with colleagues, superiors and collaborators to the pursuit of common objectives;
- performs their duties, regardless of the level of responsibility associated with their role, to the highest degree of efficiency, complying with the operational instructions issued by higher levels of management;
- shall adapt their internal and external conduct to the principles and values set out in this Code, in the awareness of the responsibilities that the Company requires them to comply with in the course of their work;
- behaves towards colleagues in accordance with the principles of civil coexistence and full collaboration and cooperation;
- considers confidentiality to be a vital principle of the business;

Compliance with applicable laws and regulations is a specific obligation of every employee, who is required to report to their manager:

- any violation - committed within the company - of laws or regulations, or of this Code;
- any omission, falsification or negligence in the keeping of accounts or in the storage of documentation on which accounting records are based;
- any irregularities or malfunctions relating to the management and methods of service provision, in the certainty that no retaliation will be taken against them.

Employees are prohibited from:

- pursuing personal interests to the detriment of the company's interests;
- exploiting the name and reputation of the Company for private purposes and, similarly, exploiting for personal gain the position held within the Company and the information acquired in the course of their work;
- adopting attitudes that could compromise the image of the company;
- using company assets for purposes other than those for which they are intended;
- the unnecessary consumption or irrational use of means and resources;
- the disclosure to third parties or use for private or otherwise improper purposes of information and news concerning the Company;
- performing work duties – even free of charge – that conflict with or compete with the Company.

The termination or termination of employment with the company, regardless of the cause, does not justify the disclosure of confidential information or the expression of opinions that may damage the image and interests of the company.

All employees undertake to comply with the Company Regulations relating to personnel.

5.1 Hierarchical relationships

The conduct of each manager shall comply with the values of the Code of Ethics and shall set an example for their colleagues.

Managers shall establish relationships with their colleagues based on mutual respect and fruitful cooperation, promoting the development of a sense of belonging to the Company. Employee motivation and the dissemination of company values – so that they can be internalised and shared – are essential: with this in mind, we are committed to implementing and maintaining accurate, valid and motivating information flows, capable of making employees aware of the contribution made to the company's activities by each of the resources involved.

Each manager supports the professional growth of the resources assigned to them, taking into account the aptitudes of each individual when assigning tasks, in order to achieve real efficiency in the workplace. Everyone is guaranteed the same opportunities to express their professional potential.

Each manager pays due attention and, where possible and appropriate, follows up on suggestions or requests from their colleagues, with a view to total quality, encouraging motivated participation in the company's activities.

6. EXTERNAL RELATIONS

6.1 Relations with institutions

Relations with the Public Administration must be based on clarity, transparency and professionalism, on the recognition of respective roles and organisational structures, also for the purposes of positive dialogue aimed at substantial compliance with applicable regulations.

The relevant company departments maintain the necessary relations with the institutions, which shall be conducted in accordance with the General Principles of this Code of Ethics. All employees are required to comply with the same principles of transparency, compliance with obligations and cooperation with the authorities.

6.2 Relations with customers and suppliers

Fairness, professionalism, efficiency, seriousness and reliability are the basis for establishing a valid relationship with suppliers and external collaborators, who are selected on the basis of assessments based on objective reference elements.

The selection of suppliers and the determination of purchasing conditions must be based on an objective assessment of the quality, usefulness and price of the goods and services requested, the ability of the counterparty to supply and guarantee goods and services of a standard appropriate to the Company's needs in a timely manner, as well as its integrity and solidity.

In their relations with customers and suppliers or with other parties with whom they come into contact for work reasons, senior management and employees may not accept compensation, gifts or favourable treatment of more than symbolic value; employees are required to inform their line manager of any offers received in this regard. Similarly, it is forbidden to offer or pay undue compensation, gifts or favourable treatment of more than symbolic value and in any case unrelated to normal courtesy, with the intention of unlawfully favouring the interests of the Company.

7. IMPLEMENTATION, MONITORING AND UPDATING OF THE CODE OF ETHICS

7.1 Dissemination and updating of the Code of Ethics

The company undertakes to promote and ensure adequate knowledge of the Code of Ethics by disseminating it to the Recipients through specific, effective and adequate information and communication activities.

It should be noted in particular that this Code is published on the Company's website.

The Company also undertakes to update the contents whenever changes in the context, the relevant legislation, the environment or the company organisation make this appropriate or necessary.

7.2 Consequences of violating the Code of Ethics

The rules of conduct defined in the Code constitute a basic reference point to which the Recipients must adhere in their relations with other parties.

Violation of the principles and contents of the Code by the Recipients may constitute a breach of their employment and/or contractual obligations, with the possibility of imposing the disciplinary measures provided for in the Company's Model, of which this Code is an integral part, on those responsible.



7.3 Mandatory nature

Compliance with the rules of the Code of Ethics is an essential part of the contractual obligations of employees. The obligation to comply with this Code is included in collaboration contracts. Violation of the provisions of the Code of Ethics by employees (employees and collaborators) constitutes a breach of contractual obligations and may result in the application of the sanctions provided for by the relevant National Collective Labour Agreement and national legislation.

Approved by the Board of Directors on: 30.07.2025

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